



# International Transport Group, Inc.

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FEDERAL MARITIME COMMISSION

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Honorable Bryant L. Van Brakle  
Secretary  
Federal Maritime Commission  
800 North Capitol Street NW  
Suite 1026  
Washington, DC 20573

RE: Petition of National Customs Brokers and Forwarders  
Association of America, Inc. for a Limited Exemption  
From Certain Tariff Requirements of the Shipping Act  
of 1984

Petition No. 05-03

Dear Secretary Van Brakle:

I am Charmaine Holt, Vice President of International Transport Group, Inc. currently a licensed NVOCC (#4492NF) with only one office positioned in Mt. Prospect, Illinois. We maintain working relationships with various agents throughout Europe, Far East, Central and South America.

Our tariff is published by Ocean Tariff Bureau, Long Beach, California and listed in the FMC website. Maintaining the current tariff at a yearly expense of \$720.00, plus additional fees for deletion, additions, and changes applicable to the rate structures deemed by the steamship lines.

The expenditures incurred to maintain our tariff are extensive for a small NVOCC. But in order to be competitive with the larger NVOCC's, we must absorb these costs. We feel that this is an unfair practice due to the fact that some steamship lines route their cargo over Canada and do not file tariffs with the FMC. This procedure appears to be somewhat unfair.

International Transport Group, Inc. strongly supports the petition that NVOCC's be exempted from filing rates, or at least granted the privilege of filing "range rates".

Hopefully, the above will be taken into consideration when a final ruling is made by the FMC.

Respectfully,  
INTERNATIONAL TRANSPORT GROUP, INC.

*Charmaine Holt*

Charmaine Holt  
Vice President

ch/s  
cc: File